

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**CENTRALSQUARE  
TECHNOLOGIES, LLC,**

**Plaintiff,**

**v.**

**CARBYNE, INC., and  
CARBYNE, LTD.**

**Defendants.**

**Civil Action No. 1:24-cv-01497-ADA**

**JURY TRIAL DEMANDED**

**CASE READINESS STATUS REPORT**

Plaintiff and Counterclaim-Defendant CentralSquare Technologies, LLC (“CentralSquare”), and Defendants and Counterclaim-Plaintiffs Carbyne, Inc. and Carbyne, Ltd. (“Carbyne”), hereby provide the following status report.

**SCHEDULE**

A scheduling order has not yet been filed. A motion for scheduling order will be submitted in accordance with the Standing Order Governing Proceedings — Patent Cases (by July 7, 2025).

Dates for a *Markman* hearing and for trial have not yet been proposed. The Parties filed a Joint Motion to Extend Time to File Case Readiness Status Report (CRSR) on May 16, 2025, extending the deadline by agreement for the CRSR to June 9, 2025, with all subsequent deadlines to be keyed off that date (pursuant to the Court’s Standing Order Regarding Joint or Unopposed Requests to Change Deadlines, for agreed extensions of time).

The Parties are otherwise amenable to following the Court’s Exemplary Schedule, which contemplates a Case Management Conference (CMC) on June 23, 2025 (2 weeks after the

submission of the CRSR), a *Markman* hearing on December 1, 2025 (23 weeks after the Case Management Conference) and a trial beginning on November 30, 2026 (52 weeks after the *Markman* hearing).

### **FILING AND EXTENSIONS**

CentralSquare's Complaint for the infringement of U.S. Patent No. RE50,016 was filed on December 4, 2024. There have been two extensions for a total of 51 days. The first extension was for extending Carbyne, Inc.'s answer to CentralSquare's Complaint to May 12, 2025. The second extension extended the CRSR deadline to June 9, 2025.

### **RESPONSE TO THE COMPLAINT**

Carbyne responded to CentralSquare's Complaint on May 12, 2025, by filing an Answer and Counterclaims, including a counterclaim for infringement of U.S. Patent No. 11,689,383.

### **RESPONSE TO THE COUNTERCLAIMS**

CentralSquare responded to Carbyne's counterclaims on June 2, 2025, by filing a Motion to Dismiss Carbyne's counterclaims I-III under FRCP 12(b)(6) for failure to state a claim. A response to the Motion to Dismiss is due by June 16, 2025.

### **PENDING MOTIONS**

CentralSquare filed a Motion to Dismiss Carbyne's counterclaims I-III under FRCP 12(b)(6) for failure to state a claim on June 2, 2025.

### **RELATED CASES IN THIS JUDICIAL DISTRICT**

There are no related cases in this judicial district.

### **IPR, CBM, AND OTHER PGR FILINGS**

IPR2025-00959, relating to U.S. Patent No. RE50,016, was filed by Carbyne on May 9, 2025, and it has not yet been accorded a filing date.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Pursuant to the Court's Order Governing Patent Proceedings, the Parties will serve preliminary infringement contentions no later than 7 days before the CMC, on or before June 16, 2025. CentralSquare has asserted 1 patent, U.S. Patent No. RE50,016, with a total of 27 claims. Carbyne has asserted 1 patent, U.S. Patent No. 11,689,383, with a total of 20 claims.

**APPOINTMENT OF TECHNICAL ADVISOR**

Parties defer to the Court on whether to appoint a technical advisor to the case to assist the Court with claim construction or other technical issues.

**MEET AND CONFER STATUS**

Plaintiff and Defendant have met and conferred. The Parties have no pre-*Markman* issues to raise at the CMC.

Dated: June 9, 2025

Respectfully submitted,

/s/ Lionel M. Lavenue

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***Attorneys for Plaintiff and Counterclaim-  
Defendant  
CENTRALSQUARE TECHNOLOGIES, LLC***

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 9, 2025, a true and correct copy of the above document was served on all counsel of record via the Court's CM/ECF System.

/s/ Lionel M. Lavenue

Lionel M. Lavenue

**CERTIFICATE OF CONFERENCE**

On June 9, 2025, counsel conferred via e-mail regarding the contents of this status report.

/s/ Lionel M. Lavenue

Lionel M. Lavenue